

1 A. No, I do not.

2 Q. What other transactions were demonstrated at that
3 time besides telephone number selection?

4 A. Customer service record.

5 Q. Can you tell me whose customer service record was
6 retrieved?

7 A. Mine.

8 Q. Was that demonstration likewise done in connection
9 with USN?

10 A. Yes, it was.

11 Q. Are you currently a USN customer?

12 A. No, I'm not.

13 Q. What other transactions were demonstrated during
14 that demonstration besides those two?

15 A. The only other thing that was given was the
16 demonstration of MORTEL which is the interface
17 that was used by the customer service record,
18 Ameritech customer service record. Perhaps there
19 were more.

20 Q. What transactions were demonstrated in connection
21 with MORTEL?

22 A. Just reviewed an order that was received over the
23 interface.

24 (Exhibit 5 marked.)

25 BY MS. MARSH:

1 Q. I'll hand you what we've marked as Exhibit No. 5.

2 MS. MARSH: For the record Exhibit No. 5
3 are Ameritech-Wisconsin's responses to a series of
4 questions that were submitted to
5 Ameritech-Wisconsin by the staff of the Wisconsin
6 Public Service Commission.

7 BY MS. MARSH:

8 Q. Mr. Rogers, did you participate in the preparation
9 of these responses?

10 A. I'm still reviewing it, Counsel.

11 Q. Okay.

12 A. The only one I noted I personally contributed any
13 information on was question 16.

14 Q. Can you turn your attention to the response to
15 question 6.

16 A. Yes.

17 Q. Now, as I understand it this information purports
18 to be current performance information for response
19 time for live transactions as processed over the
20 preordering interface, is that how you read that?

21 A. That's how I read that, yes.

22 Q. Do you know what report or information was relied
23 on to compile this information?

24 A. No, I do not. The only thing that I know that was
25 existent that could have done this was the actual

1 transaction log, some sort of a manual process to
2 do this.

3 Q. I'm sorry --

4 A. I'm not familiar with what report was used to do
5 this.

6 Q. Have you attempted in connection with your
7 testimony here today to calculate average response
8 time of the preordering interface?

9 A. No. I have looked at the results of capacity and
10 stress testing to get what the average response
11 time was. But I have not done a report such as
12 this.

13 Q. The response actually makes reference to CSR,
14 requests telephone number reservations and due
15 date reservations; is that correct?

16 A. Yes, it does.

17 Q. But if I understand your testimony here today,
18 there is no CLEC that is currently using the
19 telephone number reservation or the due date
20 reservation function of the Ameritech interface;
21 is that correct?

22 A. That is correct. The only one I definitively know
23 is the CSR.

24 Q. Do you know if in calculating these response times
25 the person who prepared this considered those

1 situations where there was a delay in retrieving a
2 CSR?

3 A. Counsel, I believe that would probably be the
4 difference of why there are between 5 and 60
5 seconds. The only reason would be delays that
6 would cause it to be higher.

7 Q. Do you know for a fact if that person considered
8 all those situations in arriving at these numbers?

9 A. I'm not privy to exactly how this information was
10 provided. But from my perspective just looking at
11 the data, it is taking all the transactions and
12 saying that the bottom line, 96 of them completed
13 in less than 60 seconds, 96 percent. So I'm
14 assuming that that's what they included, the delay
15 was less than 60 seconds.

16 Q. Do you know for the months of January or February
17 how many customer service records USN retrieved?

18 A. For the month of -- I'm not sure what month it
19 was. I believe it was January, the number is
20 1677, the same as the number that's provided on
21 that data request on the first part of this.

22 Q. And do you know of those how many were retrieved
23 while a USN representative was on line with a
24 customer and how many were retrieved off line?

25 A. We have no way of knowing.

3
1 Q. Let's turn next to the ordering and provisioning
2 interfaces which I will try to address in
3 combination. Mr. Rogers, I'm going to turn your
4 attention next to two exhibits that were attached
5 to Mr. Connolly's testimony as TMC-5 and TMC-9.

6 MR. DAWSON: Joan, are you marking those
7 as exhibits?

8 MS. MARSH: It wasn't my intent unless
9 Your Honor would prefer me to. For the record
10 TMC-5 attached to Mr. Connolly's testimony are the
11 AT&T Ameritech service readiness testing results
12 for the State of Illinois. TMC-9 attached to Mr.
13 Connolly's testimony are the AT&T Ameritech
14 service readiness testing results for the State of
15 Michigan.

16 MR. DAWSON: Could we clarify the date
17 of the testing, Ms. Marsh?

18 MS. MARSH: The date the testing was
19 run?

20 MR. DAWSON: Um-hum.

21 MS. MARSH: The date of both reports are
22 for the week ending 2/14, but they're cumulative
23 results. The date of the service readiness
24 testing in Illinois was from October 6th, and for
25 these results ending the week of 2/14. The date

1 of the testing in Michigan was from January 28th
2 and again, for the results on this exhibit ending
3 the week of 2/14.

4 BY MS. MARSH:

5 Q. Mr. Rogers, these two exhibits reflect the results
6 of AT&T Ameritech testing of the ordering
7 interface for resale purposes; is that correct?

8 A. I believe that is correct.

9 Q. Can we look at TMC-5 first which are the results
10 for the Illinois testing. Now, as I read these
11 results of the total 328 orders tested, 54 percent
12 of those fell out to a manual process; is that
13 correct?

14 A. I believe that's correct.

15 Q. And also as I read these results as reported by
16 Ameritech of the total 328 orders processed, 142
17 of them were rejected; is that correct?

18 A. That is correct.

19 Q. Is this a document that is produced by Ameritech?

20 A. Yes, it is.

21 Q. And do the results of the testing as reflected on
22 this document, are they as characterized by
23 Ameritech?

24 A. Yes, that is correct.

25 Q. Of the 54 percent of the orders that fell out to

1 manual processing, has Ameritech discussed the
2 reasons for that fall-out with AT&T?

3 A. I believe in generalizations they have, yes. But
4 when I met with AT&T on Tuesday for a brief
5 period, we discussed we probably should have got
6 to a more granular definition of what was gotten
7 in the individual orders.

8 Q. Prior to your meeting with AT&T on Tuesday, what
9 was Ameritech's position regarding discussing the
10 reasons for manual fall-out with AT&T?

11 A. With the orders that AT&T was submitting, we were
12 open to discuss why those individual orders fell
13 on to manual intervention.

14 Q. Isn't it true, Mr. Rogers, that AT&T asked for
15 reasons on numerous occasions and were not
16 provided with those reasons?

17 A. Not for these orders. AT&T was asking for the
18 general what are all the reasons that everything
19 falls out for manual intervention, and we felt
20 that in many of those were processing issues that
21 had nothing to do with how AT&T would submit the
22 order and what they would, the quality order they
23 submitted. So we were reluctant to offer that.

24 As far as individual orders that were
25 submitted by AT&T, any questions of why the order

1 fell out to manual, why it didn't, I instructed my
2 people to be open and tell them what the reasons
3 were.

4 Q. Are you familiar with the letter from Bonnie
5 Hemphill to Susan Brian dated February 19th, 1997,
6 that was attached to Mr. Connolly's testimony as
7 Exhibit 7?

8 A. I've read it, but I'd like to see a copy of it
9 again.

10 EXAMINER JAMES: Which number is that?

11 MS. MARSH: TMC-7.

12 BY MS. MARSH:

13 Q. Isn't it true that in that letter dated February
14 19th Ms. Hemphill concluded that she could see no
15 benefit in spending resources in explaining manual
16 fall-out matters to AT&T?

17 A. I believe that was in regard to the second
18 category I was saying we were all -- the reasons
19 for why all the orders were fall-out for manual
20 intervention. Even above she says that AT&T has
21 met and we have made people available to discuss
22 the individual, review the individual orders on a
23 daily conference call. Paragraph right above
24 that, second paragraph.

25 Q. So if I understand your testimony, other than

1 discussing individual orders that may come up on a
2 daily basis, Ameritech did not want to discuss
3 issues generally related to manual process and
4 assistance?

5 A. The broad spectrum that is correct.

6 MS. MARSH: I would like to present to
7 Mr. Rogers what I will mark as Exhibit No. 6. It
8 is an order status report that was produced to
9 staff in this docket. It does include specific
10 customer phone numbers and customer names. So it
11 is one of those documents that we will subsequent
12 to the proceeding here and make sure that we
13 redact and make sure that it makes it into the
14 public record with both names and numbers
15 redacted. I'm not sure how you would like me to
16 proceed with this document right now.

17 EXAMINER JAMES: I would prefer it not
18 to be marked at this point.

19 MS. MARSH: Okay.

20 EXAMINER JAMES: Could you put some sort
21 of working designation on it that would show when
22 we get done?

23 MS. MARSH: My questions will not
24 require any information from Mr. Rogers as it
25 relates to either customer names or numbers. So I

1 don't think it will be a problem with the record.
2 What I would ask is that I designate it as
3 confidential, the document itself, and either
4 retrieve all copies that we provide the parties
5 here today or else ask all parties to treat it as
6 confidential, and then we will circulate a
7 redacted version as soon as possible.

8 EXAMINER JAMES: Why don't you get an
9 agreement from the parties to that because if
10 we're not going to -- it creates a problem to
11 create a confidential record and then get rid of
12 it.

13 MR. KELLEY: Your Honor, didn't
14 Ameritech release the confidentiality of that
15 document?

16 MR. PAULSON: No.

17 MR. DAWSON: Not as to customer names or
18 numbers. As to everything else.

19 MS. WIECKI: In the box that was
20 provided me of all public copies, I have that.

21 EXAMINER JAMES: Off the record.

22 (Discussion off the record.)

23 EXAMINER JAMES: Describe what you
24 intend to mark as Delayed Exhibit 6.

25 MS. MARSH: I'm going to mark as Delayed

1 Exhibit No. 6 an Ameritech order status report,
2 the run date of which is 2/26/97. The run time is
3 8:15. And it is 84 pages in length. For the
4 record AT&T has made a commitment to redact the
5 exhibit to eliminate all the order phone numbers
6 which is column 2 on the exhibit and all customer
7 names which is column 3 on the exhibit, and submit
8 it for the record.

9 EXAMINER JAMES: When do you think you
10 can have that?

11 MS. MARSH: By the end of the day. What
12 we would like to do is redact it and confer with
13 Mr. Paulson so he agrees all information that is
14 necessary to be redacted has been taken care of.

15 EXAMINER JAMES: Thank you.

16 (Exhibit 6 designated for delayed
17 receipt.)

18 EXAMINER JAMES: Can people get along
19 without it for the moment?

20 MR. KELLEY: The questions will
21 determine that.

22 EXAMINER JAMES: Okay.

23 MS. MARSH: What I'd like to do is
24 provide a copy to Mr. Rogers, and I have copies
25 for the panel as well. Unfortunately the copies I

1 have are missing page 84. We'll have to get along
2 without that too I guess.

3 EXAMINER JAMES: If you give the
4 commissioners copies to look at.

5 BY MS. MARSH:

6 Q. Mr. Rogers, can you identify what we've marked as
7 Delayed Exhibit No. 6 for the record?

8 A. Yes, it's an order status report.

9 Q. What information is contained on this report?

10 A. Some brief summary information about all the
11 orders that have gone through the system from a
12 period of 1/1/97 until 2/27/97.

13 Q. Does this include information about all orders
14 that have been processed from various CLECs that
15 are currently doing business with Ameritech during
16 that time period?

17 A. I believe that this one does, Counsel. The reason
18 I hesitate is there is two of these presented, one
19 is a test system and the other one is production
20 environment. I believe this is probably the
21 production environment.

22 Q. In preparation for your filed testimony in this
23 docket, did you review this order status record?

24 A. I did not go through it in detail, no. But I have
25 -- I do review it periodically.

1 Q. Did you review it in connection with the reasons
2 that orders were falling out to manual processing?
3 A. Did I personally review it for that sole purpose,
4 no, I did not.
5 Q. If you could turn to page 84. As I understand it
6 page 84 contains information about orders that
7 were inserted on February 25th; is that correct?
8 A. That is correct.
9 Q. What does the insert date refer to?
10 A. That's the date the order was received over the
11 electronic interface.
12 Q. Could you look at order No. 78003. Did that order
13 fall out to manual processing?
14 A. Yes, it did.
15 Q. Can you tell me why that order fell out to manual
16 processing?
17 A. Could not -- I can say what it says on the thing,
18 could not generate the FID value for LPCA.
19 Q. For those of us who are not system gurus, what
20 does that mean?
21 A. LPCA is a feature although I'm not a guru when it
22 comes to features either. I don't know what
23 feature it is.
24 Q. Is the fall out to manual processing that's
25 indicated in that remark, can that be attributed

1 to an error in an input from a CLEC?

2 A. I'm not sure, Counsel.

3 Q. Can you tell me why that fell out to manual
4 processing?

5 A. Beyond the order process remark, no.

6 Q. Can you tell me if Ameritech is making any steps
7 to modify or change its system so that type of an
8 error does not require an order fall out to manual
9 processing?

10 A. Counsel, we have nothing for individual errors.
11 We look at the effort to do additional
12 mechanization and reduce manual intervention as to
13 looking at the whole group of orders that came in
14 and say what are the ones that are the best key.
15 If you would only get one of these over the whole
16 period that this interface is working, we would
17 not even attempt to mechanize it.

18 MS. MARSH: Mr. Reidy has found a copy
19 of the exhibit with page 84 and would like to
20 provide one to the panel for their review. Mr.
21 Rogers, would you characterize the reasons that
22 order No. 78003 fell out to manual processing as
23 an error in Ameritech's system?

24 A. No, I would not.

25 Q. Is that something that you as the person

1 responsible for the systems would want to remedy
2 to insure that it does not happen in the future?

3 A. It depends on the overall process flow. If there
4 is -- many of these falling out and it requires a
5 lot and it can be competitive, something that can
6 be mechanized, yes, we would. But if it is onesy
7 twosy, no, we would not.

8 Q. Can you tell me how many orders that are reflected
9 in the 84 pages of this report fell out to manual
10 processing for that reason?

11 A. No, I can't.

12 Q. Can you look at order No. 78005. It indicates
13 manual processing because pending activity was
14 detected?

15 A. That is correct.

16 Q. Can you tell me what that means?

17 A. I believe it has to do with if a customer was to
18 call Ameritech and says I would like to have
19 three-way calling added to my line on Friday of
20 this week and then on Wednesday they decided they
21 wanted to go to an AT&T, MCI or USN Communications
22 and AT&T, MCI or USN submitted us an order, we
23 would have to figure out what to do with that
24 pending order on that line, whether or not we
25 should incorporate that change, we should let AT&T

1 or MCI or USN know they also had added this
2 feature so you may want to include this feature in
3 your order. So you have to manually determine
4 what is the best way to process that.

5 Q. Do you know how many of the orders as reflected in
6 this exhibit fell out to manual processing because
7 pending activity was detected?

8 A. No, I do not.

9 Q. Can you turn back to page 83 and look at order
10 77986 which is the order at the top of that page.
11 As I read that that order fell out to manual
12 processing because more than one CSR was
13 retrieved; is that correct?

14 A. That is correct.

15 Q. Can you tell me why the system would try to
16 retrieve more than one CSR for one order?

17 A. If there are two -- an order can include as many
18 number of lines as they want on the account. Five
19 line account, your order would include all five
20 lines on that order. The account structure does
21 not have to match the Ameritech account
22 structure.

23 So in the case of the ones on 84 also
24 where it says phone number found in CSR but not in
25 incoming request, and this one, what that gets to

1 you is that the accounts as portrayed by the CLEC
2 do not match the accounts structure in Ameritech.
3 So maybe there was a five line account and the
4 CLEC only took two of the lines. So when we did
5 the customer service record on those two lines, we
6 saw it was also three additional lines that
7 weren't on the order, so a service rep would have
8 to determine what's the best thing to do with that
9 as far as splitting the account or whatever.

10 In this case it said two lines were
11 brought in and they weren't on the same CSR, so
12 the CLEC probably tried to combine two accounts.
13 They would not have to know that. Nothing that
14 the CLEC would have to be cognizant of before they
15 sent the order.

16 Q. Is that reason for manual processing, can that be
17 attributed in any way to a CLEC error in
18 submitting the order?

19 A. No, it cannot.

20 Q. Right below that there is an order that indicates
21 that it was processed automatically but the order
22 status is in error. Do you know what that means?

23 A. I believe that the order was probably put into the
24 front-end system, but the service negotiation
25 system which is the same system that's used by the

1 retailer unit to put the order in and it goes into
2 the processing system in back, and there is
3 something between those two systems that it didn't
4 like. So it kicked it out.

5 Q. Do you know what between those two systems your
6 system didn't like so it kicked out?

7 A. For this order, no, I do not.

8 Q. In preparing for your testimony here today, did
9 you make any efforts to review all the orders that
10 received an order status of an error and
11 determined what the problems were?

12 A. I did not review all the orders. I just reviewed
13 and talked to the people involved what type of
14 conditions this causes, what is the effect on the
15 orders. I didn't go into every one of them in
16 detail, no.

17 Q. Do you know of the orders inserted through 2/25/97
18 how many of them received an order status of in
19 error?

20 A. No, I do not.

21 Q. Can you turn back to page 82, please, and look at
22 order No. 77941. That indicates that order was
23 processed manually due to a 1-P error. Can you
24 tell me what a 1-P error is?

25 A. I believe it's the same situation that I referred

1 to earlier except for this one we know where in
2 the process the handoff occurred and there wasn't
3 enough information. A 1-P error is that again a
4 downstream system needed some information or some
5 clarification on some data that was included in
6 the order that wasn't included in the initial
7 order. This error also happens on the retail
8 side. It's where the edits in the back-end
9 systems or the back-end what is actually processed
10 are a lot stronger than the edits at the front.

11 Q. When you refer to a downstream system, are you
12 referring to the Ameritech family of Legacy
13 system?

14 A. Yes.

15 Q. So this in fact reflects an error in the
16 underlying Ameritech OSS systems?

17 A. No, it reflects a difference between what the
18 downstream system expects and what the front-end
19 system provides. So it's identifying similar to
20 the way we identify it requires manual
21 intervention because we don't know how to process
22 it, a downstream system may do the same thing to
23 one of the upstream ones and say I can't process
24 this because I need more information and I need
25 some clarification.

- 1 Q. According to this order status record that was
2 generated by Ameritech, that is referred to as an
3 error; is that correct?
- 4 A. Yes, that is. That's the way it's categorized.
- 5 Q. According to this categorization, that is an error
6 in Ameritech's system; is that correct?
- 7 A. Counsel, I don't associate the in error status
8 with an error in the system. In error, what they
9 gave it was that the order needed to have
10 something done to it to process it. Whether it --
11 I guess you could say it's an error. If it wasn't
12 processing, it needed something to fix it.
- 13 Q. Is this what is referred to here as a 1-P error,
14 is that attributable in any way to the manner in
15 which the CLEC submitted the order?
- 16 A. No, it is not.
- 17 Q. Do you know how many 1-P errors occurred between
18 1/1/97 and 2/27/97 as reflected in this record?
- 19 A. No.
- 20 Q. Did you make any attempt to compile the number of
21 transactions that resulted in the 1-P error and
22 review those for purposes of your testimony here
23 today?
- 24 A. No, I did not.
- 25 Q. Can you even tell me which Legacy system this 1-P

1 error relates to?

2 A. 1-P errors are between -- it's all part of a
3 family of systems called ACIS which is the
4 Ameritech Customer Information System. Front-end
5 piece of it is ASON which is the Ameritech Service
6 Order Negotiation systems, and it feeds it into
7 the back-end system that does the processing. And
8 it's between those two systems. So it's out of
9 the ASON system.

10 Q. Can you turn to page 80, please, and review order
11 No. 77923 which is the order at the bottom of the
12 page.

13 A. Okay.

14 Q. The way I read this, this fell out to manual
15 because the CSR image or the customer service
16 record image failed when it was inserted into
17 MORTEL; is that correct?

18 A. That is correct.

19 Q. In that type of situation would that result in a
20 delay in a CLEC's ability to retrieve the CSR or
21 the customer service record?

22 A. No. These two are not -- there is no connection
23 between these two. CSR, the interface that is
24 used said it couldn't insert it into MORTEL.
25 Didn't say it couldn't retrieve it. We would use

1 -- the MORTEL system uses the same interface that
2 the CLEC uses to receive, retrieve the CSR. After
3 it gets the CSR, it inserts it into the database
4 just for downstream tracking so it can say what
5 was -- what did the line look like before the
6 order was submitted. But it said it did retrieve
7 it. It said it couldn't insert it into the
8 database.

9 Q. Can you tell me why the CSR image could not be
10 inserted into MORTEL?

11 A. No, I can't.

12 Q. Can you tell me how many orders reflected in this
13 record, how many orders the CSR image failed at
14 MORTEL?

15 A. From this report, no, I cannot.

16 Q. Did you make any effort to do any investigation
17 into this in connection with your testimony here
18 today?

19 A. No, I did not.

20 Q. Do you know if Ameritech is currently making any
21 efforts to determine if that problem can be
22 resolved?

23 A. Yes, they are.

24 Q. And what efforts are those?

25 A. To determine why it is happening and fix it.

1 Q. And does Ameritech know when that will be able to
2 be fixed?

3 A. No, we don't.

4 Q. Can you turn to page 78, please and review order
5 77553.

6 A. I'm sorry, what was the order number again?

7 Q. 77553. According to Ameritech's report on this
8 order, this fell to manual because the system
9 timed out while waiting for the customer service
10 record; is that correct?

11 A. That is correct.

12 Q. Do you know why the system could not have timely
13 received the customer service record?

14 A. Based on performance criteria put on the orders,
15 since the orders come into a pipe and we have to
16 make sure we can accept the next order in a timely
17 fashion, a lot of these transactions such as this
18 are timed. If its response was in a certain time,
19 even though it could succeed, it can't wait, it
20 goes and gets the next order and says try again
21 later.

22 Q. Is this a volume sensitive problem?

23 A. It's a volume sensitive problem based on the
24 Legacy system, not based on the interface.

25 Q. Is Ameritech currently making any steps to try to

- 1 remedy this problem?
- 2 A. Yes, we are.
- 3 Q. And do they know when this problem will be fixed?
- 4 A. I believe that this problem is quite less than it
- 5 has been in the past. I don't know if there is
- 6 any set target to say that it will be fixed by
- 7 such and such a date.
- 8 Q. Can this problem be attributed in any way to an
- 9 error by a CLEC in inputting an order?
- 10 A. No, it cannot.
- 11 Q. Now, I note as of the run date of this report,
- 12 2/26, this order was still pending; is that
- 13 correct?
- 14 A. That is correct.
- 15 Q. Does Ameritech make any efforts to track orders
- 16 that are pending for any time period longer than
- 17 is usual?
- 18 A. I'm sorry.
- 19 Q. Let me try that again. As you sit here today, can
- 20 you tell me if there are any orders pending from
- 21 AT&T that have been pending in Ameritech's systems
- 22 for more than a week?
- 23 A. Yes, they can.
- 24 Q. And do you track that on a regular basis?
- 25 A. Yes, we do.

3

1 Q. And how do you attempt to resolve those?

2 A. Once the orders are placed into the back-end

3 system, the Legacy system that we're referring to,

4 we process them the same way as the retail orders

5 would be. So the ability to get them completed

6 are the same as it is on the retail side. So the

7 same efforts that we do on the retail side to make

8 sure that these orders get processed is taken also

9 on the wholesale side.

10 Q. Would you be concerned right now if there are AT&T

11 orders that had been pending for more than a week?

12 A. It depends when the due date, like this one it was

13 ran on the 26th and the due date is the 27th. I

14 would hope it wasn't still pending.

15 Q. Would you be concerned if there were any AT&T

16 orders that were pending right now beyond their

17 due date?

18 A. I would be concerned, yes.

19 Q. As you sit here today, are you aware of any of

20 those?

21 A. Not definitively, no.

22 Q. Pardon me?

23 A. No, I cannot say that I know that there are orders

24 from AT&T pending.

25 Q. Let's just look at one more, and then I'll move